



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

March 12, 2018

**VIA EMAIL AND CERTIFIED MAIL-RETURN RECEIPT REQUESTED**

Article number: 7016 0910 0000 4441 6568

Thomas Ellis, Chairperson  
Planning Board  
Town of Lansing 29 Auburn Rd  
Lansing NY 14882

Re: Planning Board of the Town of Lansing Public Hearing for  
Lansing Rod and Gun Club's  
Application for Site Plan Approval to  
Relocate Trap Fields/Shooting Range  
55 Salmon Creek Road  
Lansing, New York 14882

Dear Chairman Ellis:

This letter is submitted by the U.S. Environmental Protection Agency – Region 2's ("EPA Region 2") RCRA Compliance Branch ("RCB") in the Division of Enforcement and Compliance Assistance, regarding the above referenced Lansing Rod and Gun Club's Application to Relocate Trap Fields/Shooting Range, located at 55 Salmon Creek Road, Lansing, New York 14882.

Due to the short notice provided to EPA Region 2's RCB, we are unable to send a representative to attend the Town of Lansing's Public Hearing to be held on March 12, 2018 at 6:30 PM. We, therefore, are submitting this letter to provide information to the Town's Planning Board regarding EPA's involvement with the Applicant in this matter, the Lansing Rod and Gun Club ("the Club" or "Respondent").

EPA Region 2 and the Lansing Rod and Gun Club entered an Administrative Order on Consent ("AOC or "Order"), Docket No. RCRA-02-2016-7301. This AOC was issued pursuant to Section 7003 of the Resource Conservation and Recovery Act ("RCRA") on September 29, 2016. A RCRA 7003 AOC is used where a Respondent is cooperative and willing to work jointly with EPA to address a situation that poses a potential endangerment to people or the environment. The Order was issued to the Club requiring it to take steps to prevent lead shot from the shooting range from entering the nearby wetlands area and Salmon Creek (the "Creek") located in close proximity to the Club's Trap Fields/ Shooting Range ("the Shooting Range").

The Order provides options for the Club to stop lead shot from entering the wetlands area and the Creek. The Order also directs the Club to develop and implement an Environmental Stewardship Plan ("ESP") using EPA's Best Management Practices for Lead at Outdoor Shooting Ranges after the Club decides how best to stop lead shot from entering the wetlands area and the Creek (assuming it continues to operate).

On July 20, 2017, the Club informed EPA Region 2 that flooding in the local area severely impacted the Club's property and the site of the Shooting Range. The flooding made the Club's initial plan for complying with the Order no longer feasible or possible. Thereafter, the Club has pursued steps to obtain approval from the Town's Planning Board to relocate the Shooting Range to a new site. EPA Region 2 supports the relocation of the Shooting Range, provided all legal requirements are met, and believes that if properly implemented, it would satisfy the Order requirements to stop lead shot from entering the wetlands area and Salmon Creek. EPA Region 2 is anxious for the Club to obtain the necessary approvals and to implement, without further delay, the relocation of the Shooting Range, to comply with the Order and stop lead shot from entering the wetlands and the Creek. EPA believes that these actions will help protect the sensitive wetlands area and the Creek from the adverse effects associated with lead shot.

Should you require any additional public information regarding this matter, please contact Mr. Derval Thomas, RCB Team Leader, for this matter, at (212) 637-3577, or via email at [thomas.derval@epa.gov](mailto:thomas.derval@epa.gov). If Mr. Thomas is not available, you may also contact Ms. Melva J. Hayden, Esq., the attorney handling this matter, at (212) 637-3230, or via email at [hayden.melva@epa.gov](mailto:hayden.melva@epa.gov).

Sincerely yours,



For Leonard Voo, Chief  
RCRA Compliance Branch  
Division of Enforcement and Compliance Assistance  
U.S. Environmental Protection Agency – Region 2  
290 Broadway – 21<sup>st</sup> Floor  
New York, NY 10007-1866

cc: Thomas Long – Town Board Planning Consultant  
Guy Krogh, Esq. – Attorney for Town of Lansing  
Michael A. Oropallo, Esq. – Attorney for Lansing Rod and Gun Club